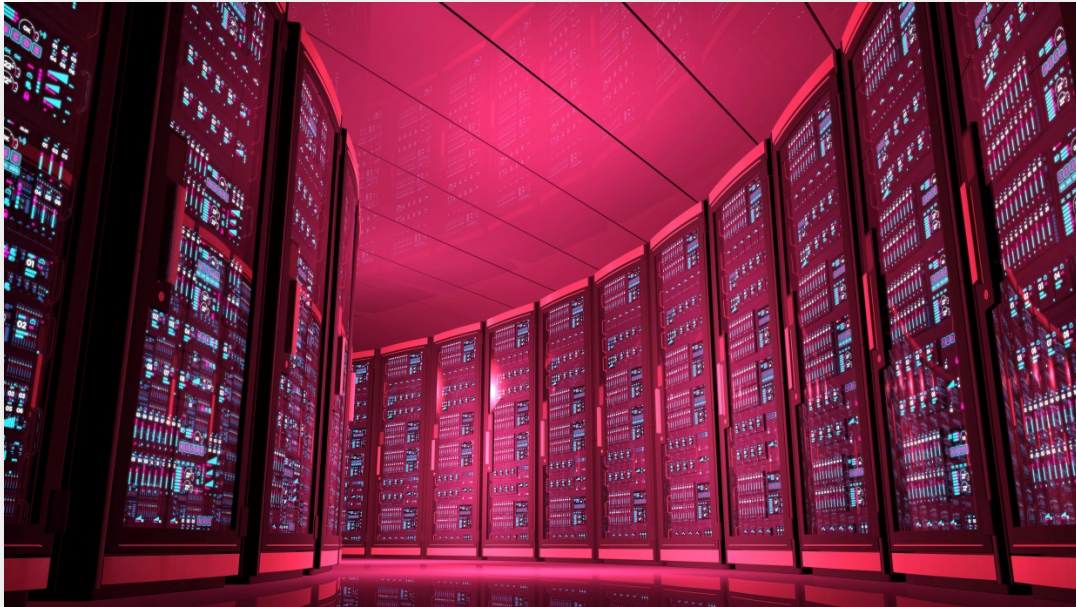


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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY E-DATA ROOM 1

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**USER GUIDE FOR OUTSIDE LITIGATION COUNSEL**

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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### I. INTRODUCTION AND OVERVIEW

The Madoff Trustee Proof of Fraud and Insolvency Data Room ("E-Data Room 1") is an electronic repository made available to attorneys representing parties involved in litigation initiated by Irving H. Picard (the "Trustee"), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. ("SIPA") and the substantively consolidated estate of Bernard L. Madoff ("Madoff").

Pursuant to the Order dated November 10, 2010, (1) Establishing litigation case management procedures for avoidance actions and (2) Amending the February 16, 2010 Protective Order issued by the U.S. Bankruptcy Court (the "Case Management Order"), as modified by subsequent Orders, E-Data Room 1 contains certain core information<sup>1</sup> that relates to

- The financial condition of BLMIS
- The operations of BLMIS, including the Ponzi scheme
- Customer account documents and correspondence with BLMIS
- Other internal records of BLMIS
- Transfers of money to, from and within BLMIS
- Regulatory disclosures made by BLMIS

Documents and data provided in E-Data Room 1 are organized generally by source, then by type of document/data. This organizational structure does not and is not intended to reflect the document/information management system used by BLMIS during its operation. The Trustee's information regarding BLMIS operations is based on information and belief, not personal knowledge.

As more fully set forth below, access to E-Data Room 1 is limited to counsel of record for defendants in certain actions brought by the Trustee ("Outside Litigation Counsel") to search for, review and request production of documents that are identified in the Trustee's Initial Disclosures or are responsive to document requests served on the Trustee.

Pursuant to the Order Establishing Expanded Access to E-Data Room 1, entered on January 12, 2012 in *SIPC v. BLMIS, et al.*, Adv. Pro. No. 08-071989(BRL), access to E-Data Room 1 may be granted to the attorneys of record for defendants in this and related adversary proceedings. In a good faith effort to prevent disclosure of Personally Identifiable Information ("PII"), the Trustee redacted dates of birth, personal addresses, and other identifying information such as Social Security Numbers, bank account numbers, taxpayer identification numbers, and other similar numbers and information that appear on

---

<sup>1</sup> As a result of Judge Stanton's order dated December 15, 2008, the Trustee has assumed possession of and/or has access in conjunction with the FBI to approximately 11,700 boxes of BLMIS paper documents and 19,000 media sources containing electronically stored information ("ESI"), which include, but are not limited to, desktop computers, laptop computers, AS/400 computers, hard drives, network storage, microfilm, microfiche, backup tapes, PDAs, floppy disks, compact discs, and memory cards. The Trustee has preserved all of the data of which he assumed possession on December 15, 2008.

With respect to these materials, some paper and some ESI are stored in one or more databases, exceeding 5 terabytes or approximately 34 million documents. Materials not contained in the databases are stored either in Long Island City, NY or Rosendale, NY.

From this large collection of evidence and for the convenience of the defendants, the Trustee is making available in E-Data Room 1 certain core documents related to the topics listed above, including documents and data identified in the Documents Considered lists associated with reports prepared by the Trustee's experts, including Bruce Dubinsky (Duff & Phelps), Matthew Greenblatt (FTI Consulting), and Lisa Collura (FTI Consulting). The Trustee cannot and does not represent that all documents related to these topics have been captured in E-Data Room 1. Nothing in E-Data Room 1 is meant to limit the scope of discovery permitted by the Court.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

many of the documents in E-Data Room 1. Where such information has been removed from a page, a notation indicating "Redacted" is displayed.

The use of any "Confidential Material," as defined in the Litigation Protected Order entered on June 6, 2011 in *SIPC v. BLMIS, et al.*, Adv. Pro. No. 08-071989(BRL) (the "LPO"), contained within E-Data Room 1 is governed by the parameters set forth in the Non-Disclosure Agreement ("NDA") that each user must execute to access E-Data Room 1, the LPO, and any subsequently entered court order(s). To the extent disclosure may be allowed under the aforementioned parameters, anyone who wishes to use data containing material confidential in nature will be required to use redaction, data deletion, masking, and/or any other appropriate measures as may be required. Disclosure to any party or counsel, whether inadvertent or otherwise, is not intended to waive privilege, work product protection or confidentiality.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### II. ACCESS TO E-DATA ROOM 1

The Trustee is providing counsel with two platforms in order to search for, review and produce documents from E-Data Room 1. The first platform is a web-based site called the **Madoff Trustee E-Data Room 1 Proof of Fraud and Insolvency Information Portal** (the "Information Portal"), to enable Outside Litigation Counsel to request database user credentials and to request documents identified for production from the Relativity E-Data Room 1 database. The Information Portal is a site separate and apart from the **Madoff Trustee E-Data Room 1 Proof of Fraud and Insolvency Relativity Data Room** ("E-Data Room 1"), which is being hosted in Relativity. This manual contains information concerning the data room work flow processes and access and use of the Information Portal. Detailed instructions regarding navigating E-Data Room 1 are provided separately in the Relativity Database Users Guide. All documents and instructions referenced in the materials provided here are also available on the Information Portal.

#### A. Who May Gain Access

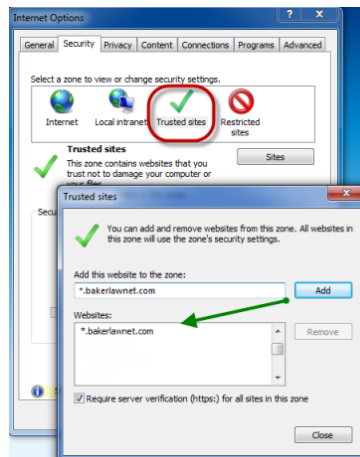
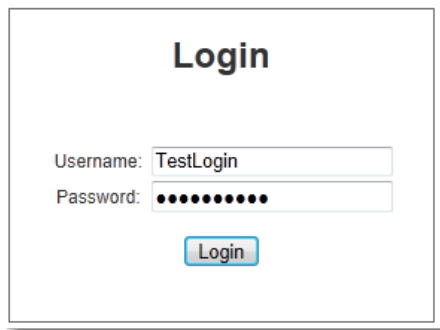
Access to E-Data Room 1 will be provided to counsel of record for defendants ("Outside Litigation Counsel") in the actions seeking solely fictitious profits in which a Notice of Applicability was filed pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order, dated November 10, 2010 [ECF No. 3141](the "Avoidance Actions").

#### B. How to Gain Access and Using the Information Portal

To access the Information Portal, please use the following link and log in with the credentials provided to you via email from the Madoff Data Rooms. Please also make sure to add **\*.bhdrrequestinfo.com** as a Trusted Site within your browser settings (e.g. for Internet Explorer, go to Internet Options\Security) <https://www.bhdrrequestinfo.com/>

*Please note: In order to provide the maximum level of security; the Hypertext Transfer Protocol (HTTP) has been disabled for the Information Portal. Please make sure you always use the Hypertext Transfer Protocol Secure (HTTPS) to guarantee secure communication between Baker Hostetler servers and your computer.*

*Please add \*@bakerlaw.com to your email system's white list to ensure communications are not filtered as spam.*



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### **QUICK TIP**

*When entering in your credentials, please ensure the following:*

1. **Type** in your username and password in lieu of copy/pasting.

### **INVALID LOGON ATTEMPTS**

*Three (3) attempts at logging in with the incorrect credentials will lock your account.*

*You will need to contact Madoff Data Rooms at [madoffdatarooms@bakerlaw.com](mailto:madoffdatarooms@bakerlaw.com) to reset your Information Portal credentials.*



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### III. ACCESSING THE INFORMATION PORTAL

#### A. Non-Disclosure Agreement

After logging onto the **Information Portal**, you will need to review and approve the Non-Disclosure Agreement ("NDA"), set forth and approved by the Court. By selecting the check box below and pressing "Submit," you have agreed to the terms referenced in the NDA. You will be emailed a copy of the NDA for your reference. A copy of the NDA can also be found in the "Documents" section on the Information Portal. For any NDA related inquiries, please contact [MadoffDataRooms@bakerlaw.com](mailto:MadoffDataRooms@bakerlaw.com).

The screenshot displays the 'MADOFF TRUSTEE E-DATA ROOM 1 INFORMATION PORTAL' interface. At the top, it says 'WELCOME JASPAH SCHLESINGER LLP. YOU ARE LOGGED IN FOR: 10/04/2017 SAMUELS, ET AL.'. The main content area is titled 'UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK' and contains the 'NON-DISCLOSURE AGREEMENT FOR E-DATA ROOM 1'. The agreement text includes 'WHEREAS this non-disclosure agreement (the "Agreement") supplements the Securities Investor Protection Corporation v. Bernard L. Madoff Investment Securities, LLC, et al., Adv. Pro. No. 08-01789 (BRL) Litigation Protective Order entered on June 6, 2011 [Dkt. 4137] (the "Litigation Protective Order")...' and 'WHEREAS, on November 10, 2010, the Bankruptcy Court entered an Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order [Docket No. 3141] (the "Litigation Case Management Order")...'. At the bottom, there is a checkbox labeled 'By checking this box I agree to the terms of the Non-Disclosure Agreement.' and a 'Submit' button, which is highlighted with a red circle and an arrow.

#### B. Navigation Area

The navigation across the top of the Information Portal will provide you with links to various sections of the site. .

1. **Home:** This link provides access to the Information Portal landing page detailing general information and contact details.
2. **Relativity Credentials:** Management of Outside Litigation Counsel Relativity credentials.
3. **Productions:** Management of Outside Litigation Counsel Relativity productions.
4. **Technical Questions:** Will list contact information to E-data Room 1 questions.
5. **Documents:** Provides access to supporting documents and guides related to E-Data Room 1 and Information Portal.

The screenshot shows the navigation bar of the 'MADOFF TRUSTEE E-DATA ROOM 1 INFORMATION PORTAL'. It features a red header with the title and a welcome message. Below the header is a grey navigation bar with five numbered links: 1 Home, 2 Relativity Credentials, 3 Productions, 4 Technical Questions, and 5 Documents. A 'Logout' link is also present on the right side of the navigation bar.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### C. Requesting E-Data Room 1 Credentials

Click on **Relativity Credentials** on the Navigation area at the top to begin the steps to request credentials for access to the Relativity E-Data Room 1 Database.

**MADOFF TRUSTEE E-DATA ROOM 1 INFORMATION PORTAL**  
WELCOME: [James Smith](#) You ARE LOGGED IN FOR: [2/22/2016](#) [2/22/2016](#)

Home **Relativity Credentials** Productions Technical Questions Documents Logout

**Welcome** [First Time User](#)

To obtain access to Relativity E-Data Room 1, the user should complete the Relativity User Request form below to obtain credentials. These credentials will be separate and apart from the credentials you received for the Madoff E-Data Room 1 Information Portal.

For instructions on field descriptions or process please reference the Data Rooms Manual in the "Documents" section.

Search For:  In Column:  Search Reset

	FIRST NAME	LAST NAME	EMAIL ADDRESS	PORTAL ALERTS	REQUESTED	RELATIVITY USERID	RELATIVITY PASSWORD	CONFIRM_SENT
<a href="#">[EDIT]</a>	John	Smith	jsmith@test.com	<input type="checkbox"/>	2/22/2016			
<a href="#">[EDIT]</a>	Jane	Smith	Jane.Smith@test.com	<input checked="" type="checkbox"/>	2/22/2016			

[+\[ADD\]](#)

Submission Status: Total User Requests: 2. Requests pending submission: 0

Standard/Planned Maintenance: Baker-Hostetler reserves 7:00 PM Eastern time Saturday to 7:00 AM Eastern time Sunday each week for potential system maintenance on all systems. If this system is unavailable during that maintenance window, users will be redirected to a web page reminding them of the standard maintenance window outage and when the system is expected to become available.

Follow these steps to request credentials to E-Data Room1. Once your credentials have been setup, you will receive a confirmation email from the Madoff Data Rooms

- STEP 1. •Select **+[ADD]**
- STEP 2. •Fill in the user(s) First Name, Last Name, Email and whether they want to receive Portal Alerts
- STEP 3. •Select **"Add User Request"**. You may remove any users prior to clicking submit.
- STEP 4. • When all users have been added, select the **"Submit"** Button.
- STEP 5. •Select the **"Confirm Submission"** on the confirmation window to continue.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

ADD NEW USER

- First Name: Jane
- Last Name: Smith
- Email: Jane.Smith@test.com
- Portal Alerts: No

ADD USER REQUEST

### Information Portal Email Alerts:

By selecting "Yes" for Portal Alerts, the selected user will receive notifications from the Information Portal when alerts are generated. This can be updated at any time by selecting **[EDIT]** on the table to update the Portal Alert options and then by selecting Yes/No on the pop up window.

EDIT USER

- First Name: John
- Last Name: Smith
- Email: jsmith@test.com
- Portal Alerts: Yes

SAVE USER

### INFORMATION PORTAL FIELDDED INFORMATION

Please reference APPENDIX D. INFORMATION PORTAL FIELDDED INFORMATION for a description of the fields currently on the Information Portal.

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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### D. Requesting documents for production

E-Data Room 1 users do not have the ability to print or download items from E-Data Room 1. To obtain copies of documents or data posted in E-Data Room 1, users must submit requests for production of such documents/data using the Information Requests as follows:

#### Review and Production of E-Data Room 1 materials

- One Relativity Saved Search Folder will be created for each law firm for a specific Adversary Proceeding Number, using the following format: APN\_Firm Name (EX: 10-12345\_BakerlawLLP).
- The Relativity Saved Search folder will be shared among users from the same law firm for a particular Adversary Proceeding Number.
- One Relativity "Coding Layout" will be created for each law firm involved with a specific Adversary Proceeding Number. The Coding Layout name will use the following format: APN\_Firm Name.
- Each user from a specific law firm for a specific Adversary Proceeding Number will use the same assigned Coding Layout to identify and "tag" documents of interest. No user besides a user from that law firm for the specific Adversary Proceeding Number will be able to access or view documents tagged in that assigned Saved Search Folder or Coding Layout.
- To obtain copies of E-Data Room 1 items of interest, a user must
  - Tag the items in the database using the appropriate "To Produce" selection provided on the Coding Layout.
  - Log on to the Information Portal. <https://www.bhdrrequestinfo.com>
  - Complete and submit the E-Data Room 1 Production Request form
    - The E-Data Room 1 Production Request form will enable users to request production of all documents tagged "To Produce" on the Relativity Coding Layout.
    - The production set will not include duplicate documents.
- Prior to production, the Trustee's attorneys will review all items to be produced for confidentiality and appropriate redaction. Where production of the same documents is requested by multiple users from the same law firm, the Trustee will de-duplicate during preparation of the production set.

Within the Information Portal, selecting the "Relativity Production" link will take Outside Litigation Counsel to the section where you will be able to easily manage Relativity document production requests. More specifically, Outside Litigation Counsel will be able to track the date of your request, the requested production format, the total number of documents and pages requested and date the production was completed Please note, only one request for production may be entered in a business day.

Document Production Time Frames - Document Production Requests are expected to take between 6-8 business days to process, from the date of the request. This time frame includes setup, processing and completion time. Weekends and holiday are not included in the 6-8 business days. Please see the holiday schedule posted in the "Documents" section to view the holiday schedule.

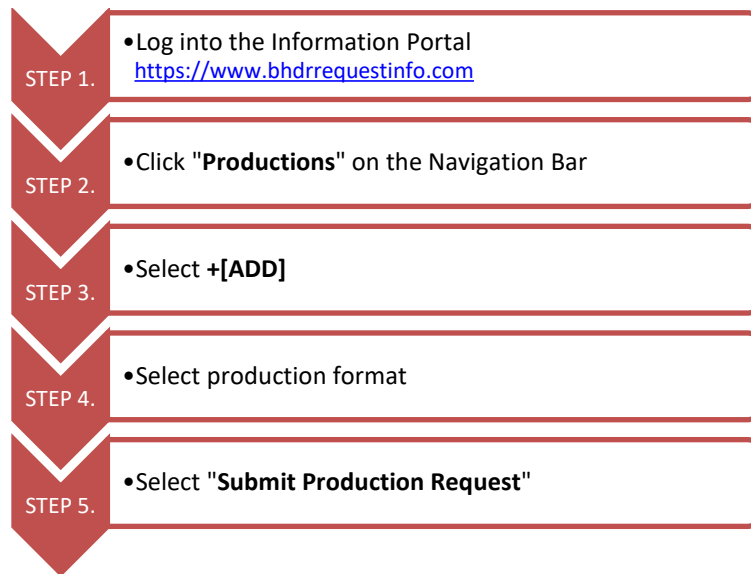


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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

**Document Production Format** -You will be provided two production format choices: “PDFs, fielded data provided in Excel format and OCR text files” or “Single Page Tiffs, Doc Level Text, DAT file for fielded data, OPT and LFP image load files.”

Once documents have been tagged in Relativity, follow the steps below to request documents for production.



All documents tagged prior to 6:00 pm EST for that business day will be processed for your production request. \*Please note, only one request for production may be entered in a business day.

The Production Request Status table will track all production requests submitted, as shown in the screenshot below.

Search For:

In Column: 

Request Date

▼

Search

Reset

DATE OF REQUEST	REQUESTED FORMAT	PRODUCTION FIELD/TAG	TOTAL DOCUMENTS	TOTAL PAGES	READY FOR RELEASE
2/18/2016	PDFs, fielded data provided in Excel format and OCR text files	10-04450_TEST	200	2500	

⚡ [ADD]

Submission Status: 1 past item(s) submitted.

Please note only one request for production may be submitted per business day.

### E. Technical Support

For technical support or assistance using the Information Portal or E-Data Room 1, please email the Madoff Data Room Team at [MadoffDataRooms@bakerlaw.com](mailto:MadoffDataRooms@bakerlaw.com).

To ensure that you receive all email communications from the Trustee's Madoff Data Rooms team add [@bakerlaw.com](mailto:@bakerlaw.com) to your email system's "white list" to ensure communications are not filtered as spam. This information is also available on the Technical Questions section on the Information Portal.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### IV. E-DATA ROOM 1 CONTENTS

#### A. Overview

##### i. E-Data Room 1 Contents

E-Data Room 1 contains

- Selected scanned hard copy documents collected from BLMIS facilities
- Selected processed data from BLMIS electronically stored information and other BLMIS data sources
- Selected scanned and processed data and documents obtained from third party sources

The terms and provisions of all applicable protective orders apply to the contents and use of E-Data Room 1.

##### ii. Searchability

- Objective information and coding about documents and data is provided as fielded information. Users may perform searches in any field. Fielded information is available about all documents and data in E-Data Room 1. For details and descriptions of fielded information and coding provided in E-Data Room 1, please refer to the discussion on page 13 and to Appendix C.
- Users may also use Relativity's Content Search function to perform text searches across all documents/data in E-Data Room 1 or within a collection. Instructions on running searches can be found in the Relativity Quick Start Guide and the Relativity Database User Guide available on the Information Portal.
  - All documents in E-Data Room 1 have been processed using optical character recognition (OCR) technology or are otherwise rendered content-searchable.
  - The Trustee used OCR technology as a good faith attempt to provide searchable versions of scanned documents. OCR technology is not perfect and the OCR process may result in errors in the visible text. The Trustee makes no warranties regarding the quality of the OCR process.
  - The original scanned versions of all OCR'd documents are posted in E-Data Room 1 along with available searchable text. If there are differences between the original and the searchable versions, the original version takes precedence.

○

##### iii. Miscellaneous

Counsel for the Trustee will not be liable for any technical issues concerning E-Data Room 1 caused by technical constraints, errors, or malfunctions beyond the Trustee's control. Any inadvertent disclosure resulting from technical constraints, errors, or malfunctions will not be construed as a waiver of privilege, work product protection or confidentiality.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### B. Data In E-Data Room 1

BLMIS information is available from data extracted from BLMIS data sources, primarily the BLMIS AS400 and related applications<sup>2</sup>. Other information was stored by BLMIS on microfilm. The Data section in E-Data Room 1 contains copies of reports and some “near-native” data obtained from these BLMIS data sources.

Summaries regarding BLMIS data sources are provided below. For more information, see **Appendix A**.

E-Data Room 1 Data is organized within the Relativity “Issue Trees” as follows.

- **Account Statements and Ledgers** - Organized in E-Data Room 1 to reflect the original data source:
  - Microfilm
  - SETCSH17 Table
  - STMTPro
  - StorQM
- **StorQM 1099**

The data sources for items in the E-Data Room 1 Data Issue Trees are as follows.

- **Microfilm** - Customer data (customer ledgers, Year-to-Date (“YTD”) summary reports) from BLMIS microfilm for the period 1978 – November 1995.
- **SETCSH17 Table** - The SETCSH17 reports are generated from BLMIS monthly backup tapes containing the SETCSH17 table. SETCSH17 data is available for years 1998-2008. The SETCSH17 table is a prepared data source created from extracted and restored BLMIS data that was aggregated by BLMIS account number to facilitate review. SETCSH17 reports in E-Data Room 1 are presented in PDF format and contain all transactions for the applicable account number, organized by month. The MS Excel files that were prepared from the extracted SETCSH17 are also available in E-Data Room 1.
- **STMTPro** - STMTPro is a proprietary AS400 add-on application developed by BLMIS programmers. Restored customer account statements using the custom STMTPro program are available to the extent the STMTPro tapes have been restored and processed. Many of the STMTPro tapes were stored with paper indices (“tape wrappers”) that provide selected information such as dates and account numbers. To the extent available, copies of the scanned tape wrappers are also in E-Data Room 1.
- **StorQM** - StorQM is a report-writing application used to generate reports from the AS400 data source. BLMIS customer data (customer account statements, YTD summary reports) for the period from December 1995 through November 2008 is available from the BLMIS AS400 data source via StorQM-generated reports.
  - When BLMIS prepared account statements for forwarding to customers, a custom StorQM “overlay” was used to generate statements that included the BLMIS logo, special coloring of data rows, and other custom printing features, as portrayed below.

<sup>2</sup> The original native files are not provided in E-Data Room 1.



### BLMIS StorQM Overlay:

[illegible]

Additional customer-specific data has been produced separately by the Trustee and may not be available in E-Data Room 1.

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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### C. Documents in E-Data Room 1

The Documents section in E-Data Room 1 contains electronic copies of hard copy documents collected from BLMIS facilities or obtained from other sources, plus objective fielded information. An E-Data Room 1 “Document” may also be the electronic print version of electronically stored information obtained from a BLMIS data source.

#### Organization of E-Data Room 1 Documents

For user convenience and guidance, E-Data Room 1 Documents are organized generally by source, then by type of document/data. This organizational structure does not and is not intended to reflect the document/information management system used by BLMIS during its operation. E-Data Room 1 Documents do not constitute a representation of the full scope or location of BLMIS documents.

E-Data Room 1 Documents are organized in Relativity “Issue Trees” as follows.

- **BLMIS Documents and Work Papers** – BLMIS work papers, charts, notes, reports, etc. collected from the Lipstick Building, Bulova, and the Queens warehouse; including documents from selected BLMIS customer files and documents and correspondence from BLMIS customers. Also includes selected processed and Bates-numbered items from BLMIS electronically stored information.
  - **BLMIS Trading Documents** – selected scanned and processed documents and reports that relate to purported BLMIS trading activities
- **BLMIS Operational Documents** – computer manuals, procedure logs, diagrams, etc. regarding BLMIS operations, including technology (not a comprehensive collection)
- **FINRA** – includes documents prepared or filed by BLMIS with FINRA or NASD (predecessor to FINRA)
- **MSIL Documents and Work Papers** – Madoff Securities International Ltd (“MSIL”) is an entity associated with BLMIS that is currently subject to a UK liquidation proceeding overseen by a court-appointed liquidator (the “JPL liquidator”). The majority of MSIL documents were collected from its headquarters located in London, England and an offsite storage facility. Additional MSIL work papers, charts, notes, reports, etc. collected were from BLMIS locations. To the extent permitted by UK law as determined by the JPL Liquidator, selected MSIL documents are available in E-Data Room 1.
  - **MSIL Operational Documents** – computer programming information, etc. regarding MSIL operations (not a comprehensive collection)
- **Other Public Documents** – publicly available documents provided for convenience, includes without limitation the report prepared by the SEC Office of Inspector General and related exhibits, transcripts of relevant plea allocutions or other testimony, pleadings from civil or criminal proceedings, and pricing or other information provided by governmental agencies
- **Other Third Party Documents** – includes selected documents provided by selected third parties in response to subpoenas or document requests and third-party documents obtained from public or commercial sources (provided for convenience); see the discussion below regarding FINANCIALS for information regarding documents from banking/financial and institutions and related
- **SEC** – includes public regulatory filings (provided for convenience) and documents produced to the Trustee by the SEC
- **Trustee Documents** – includes exemplar claims-related documents provided by the Trustee and documents filed by the Trustee (provided for convenience)



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

For more information regarding E-Data Room 1 Documents, see **Appendix B**.

### D. E-Data Room 1 Financials Section

The Financials section in E-Data Room 1 contains electronic copies of hard copy financial and accounting documents, plus objective fielded information, and electronic data collected from BLMIS facilities or obtained from other sources<sup>3</sup>.

E-Data Room 1 Financials documents are organized in Relativity "Issue Trees" in alphabetical order according to entity name. Where applicable, separate subfolders for each account held at the banking/financial institution have been created to enable access to account-specific information. Separate folders have also been created for the following BLMIS or MSIL documents:

- **BLMIS Financial Statements** – includes copies of audited BLMIS financial statements (1997-2008) and related documents.
- **BLMIS General Ledgers** – includes copies of BLMIS general ledgers available between 1996 and 2008.
- **Invoices & Related** – includes copies of selected hard copy invoices and related documents regarding BLMIS House 17 or House 5 transactions.
- **MSIL Financials** – includes copies of selected documents regarding the financial condition and operations of MSIL and predecessor entities, including annual returns, financial statements and directors' reports, and other documents or data filed with the UK Companies House or obtained from processed data/documents from BLMIS or MSIL data sources. All processed data/documents obtained from MSIL data sources are available in the US with the express permission from the JPL liquidator.

### E. Documents Released Into E-Data Room 1

Documents released into E-Data Room 1 are organized in Relativity "Issue Trees" as follows:

- **Released within the last 30 Days** – Documents released within the last 30 days are readily available by selecting this issue tree value within E-Data Room 1.
- **Released within the last 60 Days** – Documents released within the last 60 days are readily available by selecting this issue tree value within E-Data Room 1.
- **Released within the last 90 Days** – Documents released within the last 90 days are readily available by selecting this issue tree value within E-Data Room 1.
- **Released within post 90 Days** – Documents released past the last 90 days are readily available by selecting this issue tree value within E-Data Room 1.

### F. E-Data Room 1 Fielded Information

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<sup>3</sup> The Trustee collected documents regarding financial accounts or transactions relating to the assets of BLMIS, BLMIS-related entities including MSIL, and Bernie and Ruth Madoff. Documents that relate to asset amounts that do not affect the insolvency analysis of BLMIS have not been posted in E-Data Room 1. Copies may be provided upon request.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

Objective information about items posted in E-Data Room 1 is provided as fielded information. Users may perform searches in any field. Fielded information is available about all items in E-Data Room 1, whether or not the data or document is amenable to content searching.

The fielded information is from a variety of sources, including original metadata from processed native files, coded fields based on information collected during evidence collection, and system-generated information.

The fielded information is provided by the Trustee as a good faith attempt to provide source information regarding Data and Documents that are made available in E-Data Room 1.

In some instances, the fielded information was prepared by the Trustee's consultants or agents. Presentation of the fielded information does not and is not intended to waive privilege or confidentiality.

For details and descriptions of the field names and fielded information provided in E-Data Room 1, see Appendix D. The field names and descriptions are also available in the **E-Data Room 1 Relativity Quick Start Guide**.

### G. Items Excluded from within E-Data Room 1

The following items are not included in E-Data Room 1:

#### 1. Account-Specific Core Account Documents

- Core Account Documents ("CADs") regarding BLMIS accounts have been defined to include: (a) the BLMIS customer account file to the extent it has been located; (b) customer account statements (including all iterations) and ledgers generated from the StorQM data source or restored from microfilm; and (c) Portfolio Management Reports ("PMRs") and Portfolio Transactions Reports ("PMTs") generated from the StorQM data source or restored from microfilm.
- Core Account Documents (i.e., the customer file plus all available account statements and PMRs and PMTs) for each account number have been or will be produced separately to the account-holder or counsel and will not be provided in E-Data Room 1, except as follows:
  - The account-specific customer account statements, ledgers, PMRs, and PMTs are also available in the Data portion of E-Data Room 1 in the Issue Trees according to the source from which they were obtained (e.g., StorQM, microfilm, etc.).

#### 2. BLMIS Data Sources

- Native or "near-native" AS400 data tables used to generate Customer Statements, YTD summary reports, or other reports.

#### 3. Documents received from third parties that have been designated "confidential"

- Unless the producing party has consented to disclosure/production of such documents.

#### 4. Transcripts of depositions, Rule 2004 examinations, and interviews conducted of certain MSIL personnel under the supervision of the JPL liquidator

- Transcripts of testimony not designated "confidential" will be made available upon request
- Transcripts of testimony designated "confidential" will not be made available without prior written consent of the witness or counsel.



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### THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

5. Documents and data that are publicly available, except as otherwise indicated
6. Commercially available resources used by the Trustee, except as otherwise indicated, including without limitation:
  - Database of historic trading information prepared and maintained by the University of Chicago, Center for Research in Security Prices ("CRSP")
  - Database of historic trading information prepared and maintained by Chicago Board Options Exchange ("CBOE")
  - DTCC documents, including Participant Position Statements for periods from 2002-2008, DTCC Clearing Fund Deposit Report for period ended December 11, 2008
    - i. Selected Consolidated Participant Position Statements have been posted in E-Data Room 1.
    - ii. Numerous DTCC reports and data were contained in boxes prepared and stored by BLMIS, and available via a DTCC terminal on-site at the Lipstick Building (not provided in E-Data Room 1).
  - Information obtained from commercial services including subscription services or print publications regarding market trading activity or publicly traded companies, including company characteristics, historical financial performance, investment data, pricing, etc.
    - i. Numerous boxes prepared and stored by BLMIS contain documents obtained from Bloomberg and the Wall Street Journal, including documents providing pricing and performance information regarding securities (not provided in E-Data Room 1).



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### APPENDIX A

#### BLMIS ELECTRONICALLY STORED INFORMATION ("ESI") AND PROCESSED DATA

E-Data Room 1 contains Customer Account Statements, YTD summary reports, and other reports prepared from the processed BLMIS data.<sup>4</sup>

Fielded information provided in E-Data Room 1 is included to provide information regarding the physical media from which data was extracted and the BLMIS location (including custodian) of the media. This information is provided by the Trustee on information and belief and not from personal knowledge.

#### Description of BLMIS ESI and Processed Data in E-Data Room 1

- **AS400.** The IBM AS/400 ("the AS400") is a midrange server designed for small businesses and departments in large enterprises. The AS400 operating system is called the OS/400. One AS400 system was used by BLMIS for the Investment Advisory business ("House 17" or the "IA business") and a separate AS400 system was used for the Market Making & Proprietary Trading businesses (generally, "House 5"). Selected items regarding the AS400 are provided in E-Data Room 1.
- **ESI.** BLMIS had information and data in numerous forms and formats and available on different media. Selected processed and Bates-numbered items are provided in E-Data Room 1.
- **Microfilm.** BLMIS stored historic data on microfilm reels. Generally, each reel contained labeling that gave an indication what types of reports were contained on the reel. Using the label information, a subset of the microfilm reels, and the reports contained therein, were identified for processing and Bates numbering. Customer account statements and other periodic reports related to customer accounts identified on the microfilm reels are provided in E-Data Room 1.
- **SETCSH17.** SETCSH17 (also referred to as "Settled Cash") is a data table maintained in the House 17 AS400 that contains transactional customer activity used for generation of customer account statements. BLMIS archived this table on a monthly basis, purging the transactional data from the AS400 system after archive in order to preserve storage space. The SETCSH17 tables for years 1998-2008 maintained on backup tapes were identified and restored.

Although organized by month in the original BLMIS archives, the SETCSH17 reports provided in E-Data Room 1 are organized by account number to facilitate review. The SETCSH17 reports include the file name<sup>5</sup> of the original native file on the backup tape.

<sup>4</sup> The original native files are not provided in E-Data Room 1.

<sup>5</sup> There are two formats in which the native files are named:

1. EX: **506160000002\_001\_01033\_SETCSH17**
  - The 18<sup>th</sup> and 19<sup>th</sup> characters in the file name represent the year of the backup (01, representing 2001)
  - Character nos. 20-22 represent the Julian date on which the backup was created (033, representing the 33rd day of the year or February 2).



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

SETCSH17 reports are presented in E-Data Room 1 in PDF format and contain all transactions maintained on the backup tape for the applicable account number. The MS Excel (.xlsx) file containing the data presented on the PDF report is also available in the E-Data Room. Production of the SETCSH17 reports includes the PDF report plus the MS Excel (.xlsx) file.

- **STMTPro.** STMTPro (also referred to as “Statement Pro”) is a program developed by BLMIS and housed in the House 17 AS400. The program was designed to create BLMIS customer statements outside the normal monthly processing of customer statements.

The AS400 data files required to reconstruct the customer statements generated by the STMTPro program were maintained on backup tapes. The STMTPro files provided in E-Data Room 1 were reconstructed using the STMTPro program and the required contemporaneous data tables stored on the STMTPro backup tapes.

- **StorQM.** Stor/QM (“StorQM”) is a MS Windows-based end-user query management and data access tool that uses computer output to laser disk (COLD) technology for information storage, retrieval and report generation. As originally developed, StorQM downloaded report data from a mainframe to a departmental file server for end-user access. It performed reconciliation, indexing, compression and archiving functions. A pattern analyzer reverse-engineered formatted reports into transaction data by matching line items in the reports with the proper column headings.

BLMIS archived customer account statements, YTD summary reports, and other AS400-generated reports to a secure digital optical storage system named “StorQM.” Data used for each of the statements/reports was downloaded from a file server that was populated by the AS400. The statements/reports provided in E-Data Room 1 were extracted using the StorQM application from the optical storage system. The BLMIS StorQM optical storage system used WORM (write once, read many) technology, allowing for access to historical statements/reports using the StorQM application.

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2. EX: **506240020010\_001\_004\_03-04-1998\_SETCSH17**

- The date on which the backup was performed is captured in MM-DD-YYYY format in the native file name (03-04-1998, representing March 4, 1998)



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### APPENDIX B

#### BLMIS HARD COPY DOCUMENTS

Copies of selected scanned BLMIS documents from the BLMIS facilities are provided in E-Data Room 1.

Fielded information provided in E-Data Room 1 is included to provide information regarding the location (including custodian) from which documents were purportedly collected during the evidence collection process. Such location and custodian information is provided by the Trustee on information and belief and not from personal knowledge.

Documents were collected from three (3) floors at the Lipstick Building on which BLMIS had office and work areas: Floors 17, 18, and 19. In addition, BLMIS leased two (2) rooms in the Lipstick Building basement for storage purposes. BLMIS also leased an off-site “hot” disaster recovery site (“Bulova”) and long-term storage space at an off-site warehouse (the “Queens warehouse”).

Unique alpha designations were assigned to Lipstick Building locations (excluding the Lipstick Building basement) from which documents were collected, using BLMIS floor plans that identified office and workstation occupants. It is the understanding of the Trustee that the BLMIS floor plans were created and maintained by BLMIS employees.

- Copies of the floor plans for the three (3) floors (17, 18, and 19) occupied by BLMIS and associated companies are available in E-Data Room 1.
- BLMIS leased two storage rooms in the Lipstick Building basement – a smaller room (denoted Room A), and a large room (denoted Room B). All BLMIS documents collected from a Lipstick Building basement room are assigned designations to indicate the room from which they were collected (BA denotes Lipstick Basement Room A, BB denotes Lipstick Basement Room B)
- All documents collected from Bulova are assigned designation MBU (Madoff Bulova).
- Except as noted, all documents collected from the Queens warehouse are assigned designation MQW (Madoff Queens warehouse).

In early 2009, a separate report with associated exhibits was prepared by Lazard Frères (the “Lazard Report”) regarding the Madoff market-making/proprietary trading business (“House 5”) operations to assist the Trustee in the sale of that business (“Project M”). Processed and Bates-numbered versions of the Lazard Report and exhibits (the “Lazard CD”) are also provided in E-Data Room 1.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### APPENDIX C

#### E-DATA ROOM 1 INFORMATION PORTAL FIELDDED INFORMATION

##### RELATIVITY CREDENTIALS FIELDS

INFORMATION PORTAL FIELD NAME	DESCRIPTION
FIRST NAME	<ul style="list-style-type: none"><li>First Name of the user requesting access</li></ul>
LAST NAME	<ul style="list-style-type: none"><li>Last Name of the user requesting access</li></ul>
EMAIL ADDRESS	<ul style="list-style-type: none"><li>Email address of the user requesting access</li></ul>
PORTAL ALERTS	<ul style="list-style-type: none"><li>Contains values from the following fields: Date-Begin Date Range, Date-Check Clear Date, Date-Date Created, Date-Date Received, Date-Date Sent, Date-End Date Range, Date-Microfilm Ledger Date, Date-Statement Date</li></ul>
REQUESTED	<ul style="list-style-type: none"><li>Date Relativity credentials were requested</li></ul>
RELATIVITY USERID	<ul style="list-style-type: none"><li>Relativity username provided by CDS for access to E-Data Room 1</li></ul>
RELATIVITY PASSWORD	<ul style="list-style-type: none"><li>Relativity password provided by CDS for access to E-Data Room 1</li></ul>
CONFIRMATION SENT	<ul style="list-style-type: none"><li>Date Relativity credentials were sent to counsel</li></ul>

##### PRODUCTION REQUEST STATUS FIELDS

INFORMATION PORTAL FIELD NAME	DESCRIPTION
DATE OF REQUEST	<ul style="list-style-type: none"><li>Date Relativity production was requested</li></ul>
REQUESTED FORMAT	<ul style="list-style-type: none"><li>Production format for documents requested for production<ul style="list-style-type: none"><li>PDFs, fielded data provided in Excel format and OCR text files <i>OR</i></li><li>Single Page Tiffs, Doc Level Text, DAT file for fielded data, OPT and LFP image load files</li></ul></li></ul>
PRODUCTION FIELD/TAG	<ul style="list-style-type: none"><li>Name of Relativity Document Review Tag (i.e., 10-01234_Test Firm)</li></ul>
TOTAL DOCUMENTS	<ul style="list-style-type: none"><li>Total number of documents prepared for production</li></ul>
TOTAL PAGES	<ul style="list-style-type: none"><li>Total number of Pages prepared for production</li></ul>
READY FOR RELEASE	<ul style="list-style-type: none"><li>Date Relativity production was completed and provide to the Baker Hostetler responsible attorney</li></ul>



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

### APPENDIX D

#### FIELD INFORMATION INCLUDED IN E-DATA ROOM 1

##### MASTER SEARCH FIELDS<sup>6</sup>

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
MASTER ACCOUNT NAME	<ul style="list-style-type: none"><li>Contains values from the following fields: Account Name, Account Nickname</li></ul>
MASTER ACCOUNT NUMBER	<ul style="list-style-type: none"><li>Contains values from the following fields: Account Number, Account Number-Account Referenced, Account Number-Customer File, Account Number-Master Account, Account Number-Microfilm Account Number, Account Number-Microfilm SubAccount as Coded, Account Number-Microfilm SubAccount, Account Number-Old</li></ul>
MASTER CUSTODIAN_LOCATION	<ul style="list-style-type: none"><li>Contains values from the following fields: Custodian-ESI, Scanned Custodian-Source/Location</li></ul>
MASTER DOCUMENT DATE	<ul style="list-style-type: none"><li>Contains values from the following fields: Date-Begin Date Range, Date-Check Clear Date, Date-Date Created, Date-Date Received, Date-Date Sent, Date-End Date Range, Date-Microfilm Ledger Date, Date-Statement Date</li></ul>
MASTER FILE NAME	<ul style="list-style-type: none"><li>Contains values from the following fields: File Name, File Name-Original</li></ul>
MASTER TITLE_DESCRIPTION	<ul style="list-style-type: none"><li>Contains values from the following fields: Bank Document Description, Microfilm Document Name, Title</li></ul>

##### DOCUMENT/IMAGE NUMBER FIELDS

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
DocID	<ul style="list-style-type: none"><li>Unique number assigned to each individual file/document in the database, the beginning Bates number of the file/document</li><li>The Trustee's Bates numbers consist of an alpha prefix followed by 8-number sequential number<ul style="list-style-type: none"><li>Documents obtained via subpoena are assigned 3- or 4-character prefixes assigned by the Trustee. Trustee-assigned Bates numbers are assigned to all documents obtained via subpoena, including documents previously numbered by the subpoenaed third-party.<sup>7</sup></li></ul></li><li>Where the subpoenaed third-party has provided previously numbered documents/pages, the "original Bates number" information is also provided</li></ul>

<sup>6</sup> The Master Search Fields were added during creation of E-Data Room 1 to enable better search functionality. They contain all values from the identified fields.

<sup>7</sup> With one exception, once assigned, the Trustee's Bates numbers assigned to documents obtained from third parties have not been changed. One set of documents obtained from third-party JPMorgan Chase that were assigned Trustee's Bates numbers beginning with alpha prefix JPMSBT were later re-assigned Trustee's Bates numbers beginning with alpha prefix JPMVAB.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
EndDoc	<ul style="list-style-type: none"> <li>Ending Bates number of scanned page or range of pages</li> <li>The Trustee's Bates number consists of an alpha prefix followed by 8-number sequential number <ul style="list-style-type: none"> <li>Documents obtained via subpoena are assigned 3- or 4-character prefixes assigned by the Trustee. Trustee-assigned Bates numbers are assigned to all documents obtained via subpoena, including documents previously numbered by the subpoenaed third-party.</li> <li>Where the subpoenaed third-party has provided previously numbered documents/pages, the "original Bates number" information is also provided</li> </ul> </li> </ul>
Bates_Numbering_Combined	<ul style="list-style-type: none"> <li>Field created to enable better search functionality and easier retrieval of specific page(s) within selected larger digital document(s)</li> </ul>
Bates Begin Attach	<ul style="list-style-type: none"> <li>Beginning Bates number of attachment</li> </ul>
Bates End Attach	<ul style="list-style-type: none"> <li>Ending Bates number of attachment</li> </ul>
Folder Begin	<ul style="list-style-type: none"> <li>Beginning Bates number of unitized folder as captured during scanning. Because of scanning and unitization anomalies, may not be the same as the beginning Bates number of the physical folder in which the relevant pages appear.</li> </ul>
Folder End	<ul style="list-style-type: none"> <li>Ending Bates number of unitized folder as captured during scanning. Because of scanning and unitization anomalies, may not be the same as the beginning Bates number of the physical folder in which the relevant pages appear.</li> </ul>
Original Bates Begin	<ul style="list-style-type: none"> <li>For items produced to Trustee, the original beginning Bates number assigned by the producing party <ul style="list-style-type: none"> <li>As noted, all items produced to the Trustee have been assigned new ("master") Bates numbers by the Trustee</li> </ul> </li> </ul>
Original Bates End	<ul style="list-style-type: none"> <li>For items produced to Trustee, the original ending Bates number assigned by the producing party <ul style="list-style-type: none"> <li>As noted, all items produced to the Trustee have been assigned new ("master") Bates numbers by the Trustee</li> </ul> </li> </ul>
Relativity Image Count	<ul style="list-style-type: none"> <li>Provides page count information for a document, as indicated by the number of images associated with the database record</li> </ul>

### ALL E-DATA ROOM FIELDS

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
(Saved Search)	<ul style="list-style-type: none"> <li>A saved set of criteria that returns documents that meet the specified criteria; four saved searches will initially be provided for Outside Litigation Counsel users</li> </ul>
Account Name	<ul style="list-style-type: none"> <li>Account name associated with BLMIS account number, as indicated on ANames table retrieved from BLMIS AS400 datasource</li> </ul>
Account Nickname	<ul style="list-style-type: none"> <li>Abbreviated account name associated with selected BLMIS accounts, as indicated on ANames table retrieved from BLMIS AS400 datasource</li> </ul>
Account Number	<ul style="list-style-type: none"> <li>BLMIS account number, as coded from microfilm and other coded datasources or as indicated in Madoff Inventory; not necessarily the same as the standardized BLMIS account number</li> </ul>
Account Number - Account Referenced	<ul style="list-style-type: none"> <li>For selected AS400 items, provides account number of account referenced in the item</li> </ul>
Account Number - Customer File	<ul style="list-style-type: none"> <li>BLMIS account number as indicated in relevant BLMIS customer file; not necessarily the same as the standardized BLMIS account number</li> </ul>
Account Number - Master Account	<ul style="list-style-type: none"> <li>Standardized BLMIS account number, as indicated on ANames table retrieved from BLMIS AS400 datasource</li> </ul>



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
Account Number - Microfilm Account Number	<ul style="list-style-type: none"> <li>For microfilm only, BLMIS account number, as standardized to reflect the latest versions of account numbers</li> </ul>
Account Number - Microfilm Subaccount Number	<ul style="list-style-type: none"> <li>For microfilm only, BLMIS sub-account number, as standardized to reflect varying account types as indicated by related BLMIS account numbers</li> </ul>
Account Number - Microfilm Subaccount Number as Coded	<ul style="list-style-type: none"> <li>For microfilm only, unabridged subaccount number as it appears on the customer ledger</li> </ul>
Account Number - Old Account Number	<ul style="list-style-type: none"> <li>BLMIS account number as indicated in selected BLMIS datasources</li> </ul>
Adversary Proceeding Number_Firm	<ul style="list-style-type: none"> <li>Document review coding field to be used by Outside Litigation Counsel users for tagging documents requested for production</li> </ul>
Artifact ID	<ul style="list-style-type: none"> <li>System-generated field, provides unique identifier for all database objects; available search option and in search results list display</li> </ul>
AS400 Library	<ul style="list-style-type: none"> <li>Programmatic information regarding processed AS400 data</li> </ul>
AS400 Member	<ul style="list-style-type: none"> <li>Programmatic information regarding processed AS400 data</li> </ul>
AS400 Procedure	<ul style="list-style-type: none"> <li>Programmatic information regarding processed AS400 data</li> </ul>
Author	<ul style="list-style-type: none"> <li>Author field from processed electronically stored information</li> </ul>
Bank Account Number	<ul style="list-style-type: none"> <li>Account number used by bank or other financial institution to identify an account; provided only for BLMIS and affiliated entities</li> </ul>
Bank Accountholder Name	<ul style="list-style-type: none"> <li>Name of accountholder associated with a specific account held at a bank or other financial institution, as identified by the financial institution; provided only for BLMIS and affiliated entities</li> </ul>
Bank Document Description	<ul style="list-style-type: none"> <li>Description of bank document, e.g., customer check, reconciliation report, deposit slip, etc.</li> </ul>
Bank Name	<ul style="list-style-type: none"> <li>Name of bank or financial institution associated with bank documents, including bank statements, checks, bank reports, reconciliation reports, etc.</li> </ul>
Bates Begin Attach	<ul style="list-style-type: none"> <li>Beginning Bates number of attachment</li> </ul>
Bates End Attach	<ul style="list-style-type: none"> <li>Ending Bates number of attachment</li> </ul>
Bates_Numbering_Combined	<ul style="list-style-type: none"> <li>Field created to enable better search functionality and easier retrieval of specific page(s) within selected larger digital document(s)</li> </ul>
BCC	<ul style="list-style-type: none"> <li>BCC field from processed electronically stored information</li> </ul>
CC	<ul style="list-style-type: none"> <li>CC field from processed electronically stored information</li> </ul>
Check Amount	<ul style="list-style-type: none"> <li>Dollar amount as indicated on face of check</li> </ul>
Check Number	<ul style="list-style-type: none"> <li>Check number as indicated on face of check</li> </ul>
Check Payee	<ul style="list-style-type: none"> <li>Payee as indicated on face of check</li> </ul>
Custodian	<ul style="list-style-type: none"> <li>Custodian field from processed electronically stored information</li> </ul>
Date - Begin Date Range	<ul style="list-style-type: none"> <li>Beginning date for SETCSH17 report, StorQM account statements and reports</li> <li>Check date for checks</li> <li>Statement date for selected bank statements</li> <li>Beginning date range for selected scanned documents</li> </ul>
Date - Check Clear Date	<ul style="list-style-type: none"> <li>Date on which check cleared according to applicable bank/financial institution records</li> </ul>
Date - Check Date	<ul style="list-style-type: none"> <li>Check date as indicated on face of check</li> </ul>
Date - Date Created	<ul style="list-style-type: none"> <li>Date created field from selected items obtained via subpoena or production to the Trustee, date created field from processed electronically stored information</li> </ul>
Date - Date Received	<ul style="list-style-type: none"> <li>Received field from processed electronically stored information</li> </ul>
Date - Date Sent	<ul style="list-style-type: none"> <li>Sent field from processed electronically stored information</li> </ul>



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
Date - End Date Range	<ul style="list-style-type: none"> <li>Ending date for SETCSH17 report, StorQM account statements and reports</li> <li>Check date for checks</li> <li>Statement date for selected bank statements</li> <li>Ending date range for selected scanned documents</li> </ul>
Date - Microfilm Ledger Date	<ul style="list-style-type: none"> <li>For microfilm only, indicates date of microfilmed ledger as coded</li> </ul>
Date - Statement Date	<ul style="list-style-type: none"> <li>Statement date for selected bank statements</li> </ul>
Deposit Slip	<ul style="list-style-type: none"> <li>Bates number of deposit slip associated with checks deposited into an account</li> </ul>
DocID	<ul style="list-style-type: none"> <li>Unique number assigned to each individual file/document in the database, the beginning Bates number of the file/document</li> <li>The Trustee's Bates numbers consist of an alpha prefix followed by 8-number sequential number <ul style="list-style-type: none"> <li>Documents obtained via subpoena are assigned 3- or 4-character prefixes assigned by the Trustee. Trustee-assigned Bates numbers are assigned to all documents obtained via subpoena, including documents previously numbered by the subpoenaed third-party.<sup>8</sup></li> </ul> </li> <li>Where the subpoenaed third-party has provided previously numbered documents/pages, the "original Bates number" information is also provided</li> </ul>
Documents Released	<ul style="list-style-type: none"> <li>Used to identify documents newly released to E Data Room 1</li> </ul>
Edit	<ul style="list-style-type: none"> <li>Field to be used by Outside Litigation Counsel users to tag documents requested to be produced; available in search results list display</li> </ul>
EndDoc	<ul style="list-style-type: none"> <li>Ending Bates number of scanned page or range of pages</li> <li>The Trustee's Bates number consists of an alpha prefix followed by 8-number sequential number <ul style="list-style-type: none"> <li>Documents obtained via subpoena are assigned 3- or 4-character prefixes assigned by the Trustee. Trustee-assigned Bates numbers are assigned to all documents obtained via subpoena, including documents previously numbered by the subpoenaed third-party.</li> <li>Where the subpoenaed third-party has provided previously numbered documents/pages, the "original Bates number" information is also provided</li> </ul> </li> </ul>
Extracted Text	<ul style="list-style-type: none"> <li>System-generated field, contains any full text or OCR text loaded in the database; available for searching and as a radio button in the image viewer</li> </ul>
Extracted Text OR Full Text	<ul style="list-style-type: none"> <li>System-generated field, enables users to search across the extracted text or full text fields</li> </ul>
File Extension	<ul style="list-style-type: none"> <li>File extension</li> </ul>
File Name	<ul style="list-style-type: none"> <li>Provides file names of individual files, may be a rendered name for processed BLMIS data</li> </ul>
File Name - Original	<ul style="list-style-type: none"> <li>Original file name</li> </ul>
File Size	<ul style="list-style-type: none"> <li>System-generated field that provides file size information</li> </ul>
FileIcon	<ul style="list-style-type: none"> <li>Icon representing the document's Relativity native file type; available in search results list display</li> </ul>
Folder Begin	<ul style="list-style-type: none"> <li>Beginning Bates number of unitized folder as captured during scanning. Because of scanning and unitization anomalies, may not be the same as the beginning Bates number of the physical folder in which the relevant pages appear.</li> </ul>
Folder End	<ul style="list-style-type: none"> <li>Ending Bates number of unitized folder as captured during scanning. Because of scanning and unitization anomalies, may not be the same as the beginning Bates number of the physical folder in which the relevant pages appear.</li> </ul>

<sup>8</sup> With one exception, once assigned, the Trustee's Bates numbers assigned to documents obtained from third parties have not been changed. One set of documents obtained from third-party JPMorgan Chase that were assigned Trustee's Bates numbers beginning with alpha prefix JPMSBT were later re-assigned Trustee's Bates numbers beginning with alpha prefix JPMVAB.



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## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
From	<ul style="list-style-type: none"> <li>From field from processed electronically stored information</li> </ul>
Issues	<ul style="list-style-type: none"> <li>System-generated field, provides information regarding Relativity Issue folder / subfolder associated with documents</li> </ul>
MASTER ACCOUNT NAME	<ul style="list-style-type: none"> <li>Contains values from the following fields: Account Name, Account Nickname</li> </ul>
MASTER ACCOUNT NUMBER	<ul style="list-style-type: none"> <li>Search field created to enable enhanced search functionality</li> <li>Contains values from the following fields: Account Number, Account Number-Account Referenced, Account Number-Customer File, Account Number-Master Account, Account Number-Microfilm Account Number, Account Number-Microfilm SubAccount as Coded, Account Number-Microfilm SubAccount, Account Number-Old</li> </ul>
MASTER CUSTODIAN_LOCATION	<ul style="list-style-type: none"> <li>Search field created to enable enhanced search functionality</li> <li>Contains values from the following fields: Custodian-ESI, Scanned Custodian-Source/Location</li> </ul>
MASTER DOCUMENT DATE	<ul style="list-style-type: none"> <li>Search field created to enable enhanced search functionality</li> <li>Contains values from the following fields: Date-Begin Date Range, Date-Check Clear Date, Date-Date Created, Date-Date Received, Date-Date Sent, Date-End Date Range, Date-Microfilm Ledger Date, Date-Statement Date</li> </ul>
MASTER FILE NAME	<ul style="list-style-type: none"> <li>Search field created to enable enhanced search functionality</li> <li>Contains values from the following fields: File Name, File Name-Original</li> </ul>
MASTER TITLE_DESCRIPTION	<ul style="list-style-type: none"> <li>Search field created to enable enhanced search functionality</li> <li>Contains values from the following fields: Bank Document Description, Microfilm Document Name, Title</li> </ul>
Microfilm Document Name	<ul style="list-style-type: none"> <li>For microfilm only, the document name/title assigned as processing/coding time</li> </ul>
Original Bates Begin	<ul style="list-style-type: none"> <li>For items produced to Trustee, the original beginning Bates number assigned by the producing party <ul style="list-style-type: none"> <li>As noted, all items produced to the Trustee have been assigned new ("master") Bates numbers by the Trustee</li> </ul> </li> </ul>
Original Bates End	<ul style="list-style-type: none"> <li>For items produced to Trustee, the original ending Bates number assigned by the producing party <ul style="list-style-type: none"> <li>As noted above, all items produced to the Trustee have been assigned new ("master") Bates numbers by the Trustee</li> </ul> </li> </ul>
Producing Party	<ul style="list-style-type: none"> <li>For items produced by third parties, identifies the party that produced the item</li> </ul>
Relativity Compare	<ul style="list-style-type: none"> <li>Database function that allows user to compare the extracted text of one document to another, available in search results list display</li> </ul>
Relativity Image Count	<ul style="list-style-type: none"> <li>Provides page count information for a document, as indicated by the number of images associated with the database record</li> </ul>
Relativity Issue Path	<ul style="list-style-type: none"> <li>The Relativity Issue folder assigned to each document, provided to enable easier search functionality</li> </ul>
Relativity Native Time Zone	<ul style="list-style-type: none"> <li>System-generated numeric field, offsets the appearance of email headers dates and times as they appear in the image viewer; available as a search option and in search results list display</li> </ul>
Relativity Native Type	<ul style="list-style-type: none"> <li>System-generated field, displays the native file type as it was loaded into the database</li> </ul>
Scanned Custodian/Source Location	<ul style="list-style-type: none"> <li>Location from which the box and documents were collected</li> <li>Format for BLMIS scanned documents is LN, FN [of person associated with the documents] (BLMIS facility location from which the documents were collected) <ul style="list-style-type: none"> <li>EX: Madoff, Shana (Basement Area BA)</li> <li>EX: Madoff, Shana (18 Area SM)</li> <li>EX: Madoff, Shana (Queens Warehouse)</li> </ul> </li> </ul>



# BakerHostetler

## THE MADOFF TRUSTEE PROOF OF FRAUD AND INSOLVENCY DATA ROOM (rev. 2/2017)

E-DATA ROOM 1 FIELD NAME	DESCRIPTION
Security	<ul style="list-style-type: none"><li>This field displays a lock icon that will not be accessible to data room users, available in search results list display</li></ul>
Source	<ul style="list-style-type: none"><li>Provides abbreviated source information regarding publicly available documents posted in E-Data Room 1</li></ul>
Source Description	<ul style="list-style-type: none"><li>Provides source information regarding publicly available documents posted in E-Data Room 1 items</li></ul>
Subject	<ul style="list-style-type: none"><li>Subject field from processed electronically stored information</li></ul>
Title	<ul style="list-style-type: none"><li>Provides title or description information regarding selected items, generally based on file name</li></ul>
To	<ul style="list-style-type: none"><li>To field from processed electronically stored information</li></ul>

